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March 14, 2006

VIA E-FILE

The Honorable Sue L. Robinson
U.S. District Court for the District of Delaware
844 North King Street - Room 4209
Lock Box 18
Wilmington, DE 19801

Re: Teleglobe v. BCE

Civil Action No. 04-CV-1266

Dear Judge Robinson:

We are aware that the Court does not typically permit letters from counsel to chambers. We feel compelled, however, to ask that the Court accept this brief explanation of the way in which we have organized the papers we are filing today in support of our Motion to Affirm Special Master Seitz' final rulings on the privilege dispute in this matter.

Consistent with the Court's expressed preference, we have set forth our arguments in support of our Motion to Affirm in a short "speaking motion", a copy of which is provided herewith.

Given Ms. Aaron's (for Defendant BCE) statements, however, regarding her wish to generate a record, we have undertaken to lodge with the Clerk's office an appendix containing record materials that the plaintiffs' submitted to Special Master Seitz. This appendix consists of Volumes A through F, and contains the record materials upon which we rely in our speaking motion.

Respectfully,

C. Malcolm Cochran, IV (#2377)

CMC/dqc Enclosure

cc: Clerk of the Court (w/ enclosure; via e-file)

Pauline K. Morgan, Esq. (w/ enclosure; via hand delivery)

Gregory V. Varallo, Esq.(w/ enclosure)

George J. Wade, Esq. (w/ enclosure; via federal express)

Joseph A. Rosenthal, Esq. (w/ enclosure; via hand delivery)

John P. Amato, Esq. (via federal express)